

FISHER & PHILLIPS LLP
3993 Howard Hughes Parkway, Suite 650
Las Vegas, Nevada 89109

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF TEAMSTERS
LOCAL 631 SECURITY FUND
FOR SOUTHERN NEVADA,

Plaintiff,

vs.

NATIONAL CONVENTION
SERVICES, INC., a revoked New
York corporation; JOSEPH A.
SANTAMORENA, an individual
doing business as NATIONAL
CONVENTION SERVICE; and
WESTERN SURETY
COMPANY,

Defendants.

CASE NO.: 2:07-cv-01348-LRH-LRL

**STIPULATION, REQUEST AND
ORDER FOR EXTENSION
OF TIME TO FILE DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
APPLICATION FOR DEFAULT
JUDGMENT**

(Second Request)

Plaintiff Trustees of Teamsters Local 631 Security Fund for Southern Nevada ("Plaintiff"), and Defendant National Convention Services, Inc., ("Defendant"), by and through their respective counsel, hereby respectfully submit this Stipulation, Request and Proposed Order for Extension of Time to File Defendant's Opposition to Plaintiff's Application for Default Judgment This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR 7-1 of the Local Rules of this Court.

1 On October 3, 2008, Defendant filed its Motion for Extension of Time to File
2 Opposition to Plaintiff's Application for Default Judgment and [Proposed] Order
3 Thereon ("Motion"). The Order granting Defendant's Motion was signed on October
4 7, 2008, granting Defendant until October 23, 2008, within which to oppose the
5 Motion.
6

7 The parties have engaged in good faith settlement negotiations and make this
8 request for extension of time in an effort to afford further negotiations in anticipation
9 of settling this matter.

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26

27 LasVegas 77076.1

